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13 *Plaintiffs' counsel*

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15                   **UNITED STATES DISTRICT COURT**  
16                   **NORTHERN DISTRICT OF CALIFORNIA**  
17                   **SAN FRANCISCO DIVISION**

18                   IN RE PACIFIC FERTILITY CENTER  
19                   LITIGATION

20                   This Document Relates to:  
21                   No. 3:18-cv-01586  
22                   (A.B., C.D., E.F., G.H., and I.J.)

23                   Master Case No. 3:18-cv-01586-JSC

24                   **DECLARATION OF AMY M. ZEMAN**  
25                   **IN SUPPORT OF PLAINTIFFS' REPLY**  
26                   **RE MOTION TO EXCLUDE EXPERT**  
27                   **TESTIMONY**

28                   Date: March 4, 2021  
Time: 9:00 a.m.  
Judge: Hon. Jacqueline S. Corley  
Place: Courtroom F, 15th Floor

1. I am a partner at the law firm Gibbs Law Group LLP, counsel for Plaintiffs in the above-captioned action, and submit this declaration in support of Plaintiffs' reply regarding their motion to exclude expert testimony.

2. Attached as **Exhibit 1** is are excerpts from the deposition of Keith Gustafson taken on February 6, 2020.

3. Attached as **Exhibit 2** is an excerpt of the Reflections metadata produced by Pacific MSO in native format with bates number MSO026866. The excerpt shows four lines of data and omits other line items.

Dated: February 12, 2021

Respectfully submitted,

By: /s/ Amy M. Zeman

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